

May 1, 2013

VIA ECF

Hon. Jed S. Rakoff
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Nguyen et al
No. 1:11-cr-00032-JSR-4

Your Honor:

I write on behalf of my client in the above-referenced matter, Manosha Karunatilaka, to respectfully request that your Honor rule on my client's *Motion for Return of Bail* [docket entry #185], which was filed with the Court on January 11, 2013. As detailed in his motion, Mr. Karunatilaka was admitted to bail after posting cash and property to secure his appearance bond. He complied with all conditions of release, waived indictment, and pled guilty May 11, 2011, the same day the felony Information was filed. On September 15, 2011, your Honor sentenced Mr. Karunatilaka to eighteen (18) months imprisonment, followed by two (2) years supervised release. He surrendered himself to begin his term of imprisonment on December 6, 2011. He has since been released and is serving his term of supervised release. Mr. Karunatilaka is in full compliance with the terms of his supervised release.

Since Mr. Karunatilaka's case long ago concluded, any monies held, or encumbrances upon Mr. Karunatilaka's posted property, by the Court are no longer necessary, nor appropriate given that he complied with the conditions of his release, and/or the terms of his appearance bonds. A Court order is required to release his bond obligations. As such, Mr. Karunatilaka respectfully requests that, as requested in his prior motion, this Honorable Court immediately order any and all bail monies held in the custody or control of the Court, which are not subject to forfeiture to the United States, be returned, and any and all liens on his property used to secure his appearance bonds in this matter be released.

Thank you for your consideration of the foregoing request. Please do not hesitate to contact me at my below listed Boston law office should you have any questions.

Sincerely,

/s/ R. Bradford Bailey
R. Bradford Bailey

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